

Follow up OQ Program Inspection:

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- ◆ **Following Up Inspection includes two objectives:**
 - following up with Plan and Program Inspection for **all intrastate** Operators.
 - performing Field Inspection for **all intrastate and interstate** Operators.

Follow up: Cont.

◆ The Follow up Plan and Program Inspection will focus on the:

- Compliance of the OQ Plan with Title 49, Part 195, Subpart G, including Implementation of the OQ Plan:**
 - Correcting all the non-compliance issues noted in the Plan and Program during previous inspection,**
 - Inspection of the Qualification Records of all persons performing Covered Tasks including appropriateness of the methods used to evaluate them during qualification process.**



Follow up: Cont.

- ◆ The OQ Field inspection will be performed following DOT OQ Protocol 9 Check List.
- ◆ The OQ Field inspection will be addressing at least the followings:
 - Identification of the person performing covered task
 - Identification of the covered task performed
 - Verification of person's qualification
 - Verification if procedure is present
 - Verification of individual's AOC knowledge
 - Verification of span of control for non-OQ



Summary Statistics:

OQ Plan and Program Violation Summary Statistics

- ◆ **Violation of 195.505(a),**
 - operator did not identified all applicable covered tasks
- ◆ **Violation of 195.505(b),**
 - operators did not qualified their employees
 - operators did not include AOC in the evaluation process
 - operator dose not have provision for contractor and other entity in their plan
 - operators did not qualified individuals using the performance evaluation methods approved in their own plan, violating their own OQ Plan.



Summary Statistics: Cont.

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- ◆ **Violation of 195.507(a) and (b),**
 - operator has no evaluation method on the OQ records of qualification.
 - operator has no dates of evaluation on the qualification records
 - operator has no contractors OQ record.
 - ◆ **Violation of 195.402(a),**
 - operator has no procedure available during field inspection for OQ covered task performed.

Summary Statistics: CA

OQ Field Violation Summary Statistics

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- ◆ **Violation of 195.505(a),**
 - the performed CT is not on the operator CT list.
 - ◆ **Violation of 195.505(c),**
 - task specific span of control is not established
 - ◆ **Violation of 195.505(b),**
 - operators use non OQ individuals to perform critical CT with zero span of control
 - ◆ **Violation of 195.507,**
 - operators has no OQ records for the contractor's personnel.

Contractors Issues

- ◆ **CSFM does not have jurisdiction over the contractors.**
- ◆ **The qualification of the contractor personnel must be addressed in the operator's qualification plan, including qualification of personnel working under a mutual aid agreement.**
- ◆ **If the operator relies on a contractor's or third-party plan, it is the operator's responsibility to demonstrate that the plan(s) meet all the requirements of this subpart.**



Conclusive Word

- ◆ If you have any questions regarding the OQ requirements, please call us at:
 - Chuck MacDonald, CSFM Pipeline Safety Supervisor (616)587-1601
 - Warren Miller warren.miller@dot.gov OPS PHMSA SW Region (713) 272-2857
 - Richard Sanders rsanders@tsi.jccbi.gov OPS PHMSA (405) 954-7214
 - Pipeline Safety Engineer: Adriana Crasnean, PE. (562) 627-0054
- ◆ SFM wish for the industry is to be in **COMPLIANCE** all the time.

